

as it was merged into Defendant Stage Stores, Inc., in November 2003. Prior to that merger, Peebles, Inc., was a corporation organized under the laws of the Commonwealth of Virginia with its principal place of business in the State of Texas.

3. Defendant Stage Stores, Inc., at the time this action was commenced, was and is a foreign corporation organized under the laws of the State of Texas with its principal place of business in the State of Texas.

4. Defendant Specialty Retailers (TX) LP, at the time this action was commenced, was and is a foreign Limited Partnership organized under the laws of the State of Texas. The citizenship of the partners of Specialty Retailers (TX) LP, is as follows:

- a. The General Partner is SRI General Partner, LLC, a foreign Limited Liability Company organized under the laws of the State of Nevada, and which is 100% owned by Specialty Retailers, Inc., a Texas corporation.
- b. The Limited Partner is SRI Limited Partner, LLC, a foreign Limited Liability Company organized under the laws of the state of Nevada, and which is 100% owned by Specialty Retailers, Inc., a Texas corporation.

5. None of the Defendants is a citizen of the State of Tennessee wherein this action has been filed.

6. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. §1332 and is one which may be removed to this Court by Defendants, pursuant to the provisions of 28 U.S.C. §1441, in that complete diversity of citizenship exists between parties. In addition, Plaintiffs aver that the matter in controversy exceeds, exclusive of interest and costs, the sum of \$75,000.00. Therefore, this Court has original jurisdiction over this action.

WHEREFORE, Defendants give notice that the above action now pending against them in the Circuit Court for Lawrence County at Lawrenceburg, Tennessee, has been removed therefrom to this Court.

DATED this 22nd day of August, 2006.

Respectfully submitted,

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*Attorneys for Defendants Peebles, Inc.,
Stage Stores, Inc., and Specialty Retailers
(TX) LP*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 22nd day of August, 2006, a true and exact copy of the foregoing Notice of Removal has been served upon the counsel for parties in interest herein by delivering same to the offices of said counsel, or by mailing same to the offices of said counsel by United States Mail with sufficient postage thereon to carry the same to its destination:

Charles M. Bates
203 West Gaines Street
Post Office Box 494
Lawrenceburg, Tennessee 38464

Brigid M. Carpenter